

EXHIBIT A

State of Illinois)
) ss
County of St. Clair)

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY
IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Timothy Birkhead, declare under penalty of perjury the following:

At all relevant times, I have been a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA). The contents of this Declaration are based on information provided to me during the course of my investigation, from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

1. Between March 30, 2021 and May 19, 2021, a Fairview Heights Police Department confidential source (CS) purchased crystal methamphetamine from Litrell YATES on three separate occasions. The CS was provided with Official Advanced Funds (OAF) for each of the purchases. Prior to the final two purchases, YATES was observed leaving a residence in O'Fallon, St. Clair County, Illinois and driving directly to the location of the crystal methamphetamine purchase with the CS. YATES was also observed parking in the garage and being at this residence at various times of the day.

2. On June 10, 2021, DEA agents/officers executed a search warrant on the O'Fallon residence. Agents were unable to locate YATES prior to executing the search warrant. At the time of the execution of the search warrant, a juvenile was the only person inside the residence.

3. Upon searching the residence, several bags of marijuana were located along with two bags of suspected crystal methamphetamine. Within the master bedroom, agents located paperwork belonging to YATES, photos featuring YATES, and numerous items of male clothing.

4. Agents also located a black Nike bag small plastic bag containing marijuana and a plastic jar containing marijuana within, which was later determined to be approximately 187.2 gross grams of suspected marijuana. The Nike bag was sitting on the floor next to the dresser on the south side of the bed in the master bedroom.

5. Inside the closet of the master bedroom, a small safe was located. The juvenile's mother and owner of the residence, Brandy Eichelberger-Pigram, spoke with agents via telephone about this safe. Eichelberger-Pigram provided the code to the safe to her juvenile child who opened the safe. Within the safe, DEA investigators located and seized loose United States currency, which was later counted and determined to be \$18,760.00. Eichelberger-Pigram stated the money within the safe was hers, but conceded that YATES also had access to the safe.

6. DEA investigators compared the seized currency from the safe with the serial numbers of the Official Advanced Funds (OAF) provided to the CS during the final controlled purchase which occurred May 19, 2021. Upon completing the comparison, investigators located eight separate \$20 bills of United States currency which matched the OAF provided to the CS for the purchase of crystal methamphetamine from YATES.

7. YATES has previously been charged with possession of marijuana and unlawful possession of a firearm.

8. Based on the foregoing, declarant believes that the subject-matter \$18,760.00 in United States Currency is property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. § 801 et seq.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of December, 2021.

/s/ Timothy Birckhead
TIMOTHY BIRCKHEAD
Task Force Officer
Drug Enforcement Administration